

1 ADAM R.F. GUSTAFSON  
2 *Acting Assistant Attorney General*  
3 ROBERT N. STANDER (DC Bar #1028454)  
4 *Deputy Assistant Attorney General*  
5 JEFFREY HUGHES (NY Bar #5367214)  
6 MARTHA C. MANN (FL Bar #155950)  
7 United States Department of Justice  
8 Environment and Natural Resources Division  
9 P.O. Box 7611  
Washington, D.C. 20044  
Tel: (202) 717-7067 (Stander)  
(202) 532-3080 (Hughes)  
Email: robert.stander@usdoj.gov  
jeffrey.hughes@usdoj.gov

YAAKOV M. ROTH  
*Principal Deputy Assistant Attorney General*  
Civil Division  
JOSEPH E. BORSON  
*Assistant Branch Director*  
Federal Programs Branch  
STEPHEN M. PEZZI (FL Bar #1041279)  
United States Department of Justice  
Civil Division, Federal Programs Branch  
1100 L Street, NW  
Washington, D.C. 20005  
Tel: (202) 305-8576  
Email: stephen.pezzi@usdoj.gov

10 *Attorneys for Defendants*

11  
12 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

13 STATE OF CALIFORNIA, et al.,  
14

15 Plaintiffs,

16 v.  
17

18 UNITED STATES OF AMERICA, et al.,  
19 Defendants.  
20

Case No. 4:25-cv-04966-HSG

**STIPULATION AND [PROPOSED]  
ORDER TO EXCEED PAGE  
LIMITATIONS FOR MOTION TO  
DISMISS**

1 Pursuant to Civil Local Rules 7-4(b) and 7-12, the parties submit this Stipulated Request  
 2 to permit the parties to file briefs in excess of the page limitations set forth in Civil Local Rule 7-  
 3 4(b). Specifically, Defendants seek to file a 30-page motion to dismiss the amended complaint  
 4 and Plaintiffs seek to file a 30-page opposition. The parties respectfully request that the Court  
 5 enter an order accordingly.

6 1. Defendants previously moved to dismiss the original complaint. Dkt. No. 118.

7 2. In response, Plaintiffs notified Defendants on September 24, 2025 that they  
 8 intended to amend their complaint pursuant to Federal Rule of Civil Procedure 15(a)(1).  
 9 Plaintiffs also notified the Court and all parties of this intent in their response to Defendants'  
 10 motion to dismiss, filed October 3, 2025. Dkt. No. 151.

11 3. On October 10, 2025, Plaintiff States filed their amended complaint. Dkt. No.  
 12 157.

13 4. On October 22, 2025, the parties filed a stipulation and proposed order setting out  
 14 a briefing schedule for Defendants' anticipated motion to dismiss in the event the Court did not  
 15 grant Defendants' motion to stay the case during the pendency of the government shutdown.  
 16 Dkt. No. 161. The Court entered the order regarding the proposed schedule, absent further order  
 17 of the Court, the following day. Dkt. No. 162.

18 5. Pursuant to the parties' stipulation and Court order, Defendants' motion to  
 19 dismiss is currently due on November 17, 2025. Dkt. No. 162.

20 6. In light of the many issues of administrative and constitutional law raised by  
 21 Plaintiffs' amended complaint, Defendants seek five pages in excess of the limitations set forth  
 22 in Civil Local Rule 7-4(b), or 30 pages total. Plaintiffs consent to Defendants' request on the  
 23 condition that they are also afforded five additional pages so that the opening and opposition  
 24 briefs remain subject to equal length requirements. Defendants consent to Plaintiffs' condition.

25 7. Accordingly, the parties respectfully request that the Court permit Defendants to  
 26 file a 30-page motion to dismiss the amended complaint and Plaintiffs to file a 30-page  
 27 opposition to Defendants' motion.

28

STIPULATION AND [PROPOSED] ORDER  
 CASE No. 4:25-cv-04966

1 Dated: November 13, 2025

Respectfully submitted,

2 /s/ Jeffrey Hughes

3 JEFFREY HUGHES (NY Bar #5367214)  
4 U.S. Department of Justice  
5 Environmental Defense Section  
6 P.O. Box 7611  
7 Washington, D.C. 20044-7611  
jeffrey.hughes@usdoj.gov  
Telephone: (202) 532-3080  
Facsimile: (202) 514-8865

8 *Attorney for Defendants*

9 Dated: November 13, 2025

10 ROB BONTA  
11 Attorney General of California  
12 MYUNG J. PARK  
13 Supervising Deputy Attorney General

14 /s/ M. Elaine Meckenstock

15 M. ELAINE MECKENSTOCK  
16 Deputy Attorney General  
17 *Attorneys for Plaintiff State of California*

18 **PHILIP J. WEISER**

19 *Attorney General for the State of Colorado*

20 /s/ Carrie Noteboom

21 CARRIE NOTEBOOM\*

22 Assistant Deputy Attorney General  
1300 Broadway, 10<sup>th</sup> Floor  
23 Denver, CO 80203  
(720) 508-6285  
24 [carrie.noteboom@coag.gov](mailto:carrie.noteboom@coag.gov)

25 **KATHLEEN JENNINGS**

26 *Attorney General of the State of Delaware*

27 By: /s/ Vanessa L. Kassab

28 IAN R. LISTON  
Director of Impact Litigation  
RALPH K. DURSTEIN III  
VANESSA L. KASSAB\*  
Deputy Attorneys General  
Delaware Department of Justice  
820 N. French Street  
Wilmington, DE 19801  
(302) 683-8899  
[vanessa.kassab@delaware.gov](mailto:vanessa.kassab@delaware.gov)

1 **ANDREA JOY CAMPBELL**  
 2 *Attorney General for the Commonwealth of*  
 Massachusetts

3 /s/ Seth Schofield  
 4 SETH SCHOFIELD\*  
 5 Senior Appellate Counsel  
 JON WHITNEY\*  
 6 Special Assistant Attorney General  
 Energy and Environment Bureau  
 7 Office of the Attorney General  
 One Ashburton Place, 18th Flr.  
 8 Boston, Mass. 02108  
 (617) 727-2200  
[seth.schofield@mass.gov](mailto:seth.schofield@mass.gov)  
[jon.whitney@mass.gov](mailto:jon.whitney@mass.gov)

11  
 12 **MATTHEW J. PLATKIN**  
 13 *Attorney General for the State of New Jersey*

14 /s/ Lisa J. Morelli  
 15 LISA J. MORELLI  
 Deputy Attorney General  
 16 New Jersey Division of Law  
 25 Market Street  
 17 Trenton, New Jersey 08625  
 (609) 376-2740  
[Lisa.Morelli@law.njoag.gov](mailto:Lisa.Morelli@law.njoag.gov)

19  
 20 **RAÚL TORREZ**  
 21 *Attorney General for the State of*  
*New Mexico*

22 /s/ William Grantham  
 23 WILLIAM GRANTHAM\*  
 Assistant Attorney General  
 24 408 Galisteo Street  
 Santa Fe, New Mexico 87501  
 (505) 717-3520  
[wgrantham@nmdoj.gov](mailto:wgrantham@nmdoj.gov)

1 **LETITIA JAMES**  
 2 *Attorney General for the State of New York*

3 /s/ Ashley M. Gregor  
 4 ASHLEY M. GREGOR\*  
 Assistant Attorney General  
 Environmental Protection Bureau  
 28 Liberty Street, 19th Floor  
 New York, NY 10005  
 (212) 416-8454  
[ashley.gregor@ag.ny.gov](mailto:ashley.gregor@ag.ny.gov)

11  
 12 **DAN RAYFIELD**  
 13 *Attorney General for the State of Oregon*

14 /s/ Paul Garrahan  
 15 PAUL GARRAHAN\*  
 Sr. Assistant Attorney General  
 16 Oregon Department of Justice  
 1162 Court Street NE  
 17 Salem, Oregon 97301-4096  
 (503) 947-4540  
[Paul.Garrahan@doj.oregon.gov](mailto:Paul.Garrahan@doj.oregon.gov)

19  
 20 **PETER F. NERONHA**  
 21 *Attorney General for the State of Rhode*  
*Island*

22 /s/ Nicholas M. Vaz  
 23 NICHOLAS M. VAZ\*  
 Special Assistant Attorney General  
 24 Office of the Attorney General  
 Chief, Environmental and Energy Unit  
 150 South Main Street  
 Providence, Rhode Island 02903  
 (401) 274-4400 ext. 2297  
[nvaz@riag.ri.gov](mailto:nvaz@riag.ri.gov)

28

1 **CHARITY R. CLARK**

2 *Attorney General for the State of Vermont*

3 /s/ Hannah Yindra

4 HANNAH YINDRA\*

5 Assistant Attorney General  
6 Office of the Attorney General  
7 109 State Street  
Montpelier, VT 05609  
(802) 828-3186  
[Hannah.Yindra@vermont.gov](mailto:Hannah.Yindra@vermont.gov)

1 **NICHOLAS W. BROWN**

2 *Attorney General for the State of  
Washington*

3 /s/ Alexandria Doolittle

4 ALEXANDRIA K. DOOLITTLE\*

5 Assistant Attorney General  
6 Office of the Attorney General  
7 P.O. Box 40117  
Olympia, Washington 98504-0117  
(360- 586-6769  
[Alex.Doolittle@atg.wa.gov](mailto:Alex.Doolittle@atg.wa.gov)

8  
9 \**Admitted pro hac vice*

10  
11  
12 *In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests that each*  
signatory has concurred in the filing of this document.

13  
14  
15 **[PROPOSED] ORDER**

16 PURSUANT TO STIPULATION, it is so ordered.

17  
18 Dated: \_\_\_\_\_, 2025

19  
20 

---

THE HONORABLE HAYWOOD S. GILLIAM, JR.  
21 United States District Judge

22  
23  
24  
25  
26  
27  
28

STIPULATION AND [PROPOSED] ORDER  
CASE No. 4:25-cv-04966